



METROPOLITAN  
**Nashville**  
PUBLIC SCHOOLS

2601 Transford Ave. · Nashville, TN 37204

*Jesse B. Register, Ed.D.  
Director of Schools*

February 2, 2015

Mark Swann  
Metropolitan Auditor  
Office of Internal Audit  
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Nashville, TN 37201

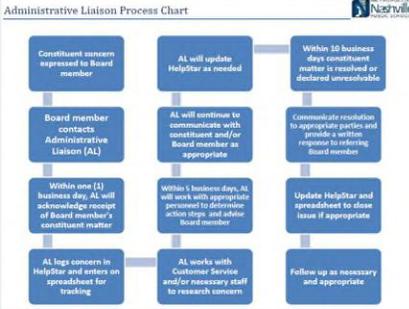
Dear Mr. Swann:

This letter acknowledges Metropolitan Nashville Public Schools (MNPS) has received the final Audit Report conducted by McConnell Jones Lanier & Murphy LLP. MNPS has evaluated the observations and the recommendations in the report and our management response is attached.

MNPS would like to express appreciation for the assistance and cooperation of you and your staff throughout this process. Any recommendation for improvements that Metro Schools can consider to increase effectiveness and efficiency in our operations and service to students and the community is always welcome.

Sincerely,

Jesse Register, Ed.D.

	Recommendation	Concurrence and Corrective Action Plan	Proposed Completion Date
<b>Management of Metropolitan Nashville Public Schools should:</b>			
1-E.1	<p>Modify existing processes within the Customer Service Center to establish a specific tracking, monitoring, and reporting protocol for handling board members' referrals of constituent matters.</p>	<p><b>Partially Accept</b></p> <p>A. During the time the audit interviews were underway, MNPS was in the process of hiring someone to specifically manage/handle constituent matters submitted by the School Board. This person's role is to ensure the complaint feeds completely through the resolution/response loop and keeps the School Board member who submitted the issue well-informed of progress and/or resolution.</p> <ul style="list-style-type: none"> <li>The School Boards' Administrative Liaison started with MNPS in <b>July 2014</b>. A snapshot of the process followed is shown here. This protocol fully addresses recommendation 1-E.1 regarding tracking, monitoring, and reporting protocol for handling board members' referrals of constituent matters.</li> </ul>  <p>B. In addition to what is shared above, MNPS has also strengthened the way resolved constituent issues can be further heard after an appeal has been filed. On <b>Aug. 15, 2014</b>, Director of Schools Dr. Jesse Register appointed Chief Support Services Officer Dr. Tony Majors to chair the appeal board. The Constituent Appeal Board Hearings are fully documented for transparency of criteria utilized to base final decisions.</p> <p>C. MNPS defends that the protocol of the Customer Service Center (CSC) is sufficient to support submission of School Board member constituent complaints, but honors the request of the School Board members for a liaison specifically tied to their submissions. It is this defense that required the process managed by the Board's administrative liaison to align directly with the process and tools used by the CSC.</p> <ul style="list-style-type: none"> <li>Complaints officially submitted through the established structure (Customer Service Center), are tracked and addressed, with potential for a small margin of error. Even though the resolution may not always be the one sought by the constituent, MNPS is always open to feedback and looks for ways to continuously improve its processes to ensure they meet the specific needs and interests of its customers.</li> </ul>	<p>August 2014</p> <p>Position in place, constituent issue management process documented, and appeal board leadership named</p>

## Management Response

DISTRICT ORGANIZATION AND MANAGEMENT

	Recommendation	Concurrence and Corrective Action Plan	Proposed Completion Date
1-G.1	Develop specific strategies and tactics to include in the School System's internal communications plan to communicate key messages, initiatives, and directives from the executive leadership team meetings to the employees throughout the system.	<p><b>Accept</b></p> <p>A. Weekly priorities/messages were consistently developed following each Executive Leadership Team (ELT) meeting starting at the beginning of the 2013-14 school year by the Assistant to the Director for Communications. These messages were then shared with the ELT and they in turn shared them with their direct reports, which included principals. Currently, this method of communication is being evaluated for effectiveness as part of the development of a strategic communications plan.</p> <p>B. Chief Officers regularly convene (normally weekly) individual leadership team meetings following ELT meetings to share system priorities and other cross-cutting issues for action.</p> <p>C. Monthly Principal meetings are held where the Director of Schools brings forward system priorities, political information that has implications for local and national education work, and any other themes that have arisen from the last exchange.</p> <p>D. Further expand/evaluate internal strategies as part of the communications plan.</p>	<p>Multiple communication methods were either expanded on or implemented during the 2013-14 school year.</p> <p>Communications Plan expected completion by June 2015</p>
1-H.1	Integrate teambuilding retreats into the cycle of periodic leadership development retreats scheduled for the executive leadership team to enhance relationship-building and collaboration.	<p><b>Accept</b></p> <p>Strategies for a highly effective team have always been embedded in Executive Leadership Team (ELT) retreats, but there have also been specific retreats designed to address this topic. For example, in January 2012, the ELT participated in a retreat that included topics such as:</p> <ul style="list-style-type: none"> <li>Overcoming the Five (5) Dysfunctions of a Team and</li> <li>Communicating to Build Understanding, Support, and Acceptance.</li> </ul> <p>In addition to the October date previously listed, there were specific teambuilding retreats held Oct. 29, 2012 and April 22, 2013.</p>	<p>Previous dates referenced: January 2012 to April 2013</p>
1-I.1	Revise the format for monthly principals meetings to allocate time to obtain feedback from principals through two-way dialogue with the executive officers for elementary and secondary schools.	<p><b>Accept</b></p> <p>The format of monthly principal meetings has been changed in 2014-15. Principals have two hours with the Director of Schools before moving into one-hour network meetings led by the lead principal. After lunch, principals move into a three-hour session organized by tiers and led by the executive officers. During this time, principals are meeting in small groups, whole group, and across tiers to have dialogue and discussion. Key principals are asked to facilitate and lead discussions and presentations.</p>	<p>Completed in 2014-15</p>

## Management Response

DISTRICT ORGANIZATION AND MANAGEMENT

	Recommendation	Concurrence and Corrective Action Plan	Proposed Completion Date
1-J.1	Modify the evaluation process for principals to require executive lead principals to conduct annual performance evaluations for building principals with input from network lead principals.	<b>Reject</b> The majority of principals are members of a network of five schools led by a Network Lead Principal. The Network Lead Principal receives additional money and the equivalent of an assistant principal FTE to lead the network and evaluate the principals in the network. The district office staff was reduced to decentralize leadership decisions and give principals additional autonomy. This decentralized model, which began in 2013, is showing promise and will continue to develop to include all principals by SY 2016-2017.	N/A
1-K.1	Communicate to principals how to access and use the common calendar on the School System's website that codifies all meetings and events scheduled by central office departments to facilitate advance planning and schedule management.	<b>Accept</b> This recommendation will be incorporated into the new strategic communications plan currently in-development.	June 2015
1-L.1	Establish mandatory school-level advisory committees at all schools to allow school staff, parents, and community members representative of the school community to be involved in the system's decision-making process.	<b>Partially Accept</b> The school improvement planning (SIP) team is already required and in place at each school. The SIP team is comprised of teachers, administration, parents, students, and community members. Advisory committees already exist in all zoned high schools within the academy model. These advisory boards are comprised of students, teachers, and business partners. Further development of school level advisory committees is questionable; however, MNPS will work to further identify roles and responsibilities.	Implemented in 2010

## Management Response

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	Recommendation	Concurrence and Corrective Action Plan	Proposed Completion Date
1-M.1	Expand the types of school-level decisions principals can make during the School System's three-year transition to school autonomy.	<b>Accept</b> During the 2013-14 school year, there were 17 schools (all I-Zone schools and schools led by a network lead principal) piloting school based budgeting. In 2014-15, all high school, middle school, and a few elementary school principals piloted school-based budgeting. These principals implemented budget flexibility and staffing during the two pilot years. All MNPS principals will implement student-based budgeting in 2015-16.	SY 2015-2016
1-N.1	Use the Principals Leadership Institute to train principals to manage their schools once they achieve autonomy from the central office.	<b>Partially Accept</b> The Principal Leadership Institute (PLI) is more than training for budget autonomy. The PLI is designed to share best practices, innovative ideas, new programs, leadership development, and development of instructional capacity. Principals have autonomy in budget flexibility and staffing and have monthly professional development to share best practices, exchanges ideas, and discuss managerial aspects of the principal job at monthly principal meetings.	PLI was implemented in 2009. Professional development conducted monthly.
1-O.1	Evaluate the School System's assistant principal staffing formula for inclusion of other relevant factors that may influence the assignment of assistant principals along with consideration of AdvancED recommended standards. Then review assistant principal positions for optimal staffing levels.	<b>Reject</b> MNPS follows a staffing formula as the baseline for allocating assistant principals based on the number of students enrolled in the building. Staffing is reviewed annually for every school during the budget process. Principals have autonomy over their budgets and may choose to purchase additional assistant principals above the staffing allocation. Also, the district considers programmatic needs, economically disadvantaged populations, exceptional education needs, and academic achievement when assigning additional assistant principal positions. Principals who are selected as Network Lead Principals are also allocated a position equivalent to an assistant principal to use in the building as needed. This allows the lead principal to be out of the building working with schools in his/her network. Following a rigid staffing formula would not provide principals flexibility in their staffing or allow the district to assign additional assistant principals based on need.  The audit report specifically states, "AdvancED's recommended staffing levels for assistant principals are by no means prescriptive; they clearly serve as a benchmark for comparison to determine <u>minimum</u> administrative staffing levels." MNPS assistant principals are not only performing administrative functions, but primarily act as instructional leaders. This "minimum" staffing level cited does not include all the staffing considerations MNPS listed above like economically disadvantaged populations and exceptional education needs.	N/A

## Management Response

DISTRICT ORGANIZATION AND MANAGEMENT

	Recommendation	Concurrence and Corrective Action Plan	Proposed Completion Date
1-P.1	Develop a comprehensive set of staffing guidelines for all support staff positions assigned to campuses that more accurately reflect not only student enrollments, but also other relevant factors that influence the assignment of support staff.	<b>Partially Accept</b> Beginning in SY15-16, the majority of school-based positions – support, certificated, and certificated administration – will no longer be assigned directly to the majority of schools. MNPS is transitioning to a model of school-level flexibility and student-based budgeting where schools will receive an allocation of resources (dollars, not positions) based on the number and type of students they serve. Principals will have the flexibility to determine the mix of staff positions in their building, within certain parameters. MNPS will develop guidance for principals on recommended and, in some cases, non-negotiable staffing levels for certain certificated and support positions.	SY 2015-2016
1-Q.1	Develop a comprehensive plan to effectively communicate the School System’s five-year strategic plan and other key initiatives to internal and external stakeholders.	<b>Partially Accept</b> This recommendation will be incorporated into the new strategic communications plan currently in development. However, communications regarding the strategic plan to date have been embedded in internal and external publications, meeting agendas/work sessions, board presentations, Director of School’s and other leaders’ presentations to various audiences (including parents), as well as school-level and departmental strategic action plans. The strategic plan was also a major component of the online module-based training completed by at least 98% of MNPS teachers over the course of 6+ months in 2014 and continues to be consistently shared in the same online training for all new teachers.	Strategic Communications Plan Completion June 2015
1-Q.2	Select a wide cross-section of parent, community members and business/civic partners and administer focus groups and surveys to them annually to obtain feedback regarding system-wide communications initiatives.	<b>Accept</b> This recommendation will be incorporated into planning and development of district’s new strategic communications plan.	June 2015
1-Q.3	Evaluate the Communications plan on an annual basis.	<b>Accept</b> This recommendation will be a component of the timeline built into the district’s new strategic communications plan for the evaluation of the plan/work.	June 2015

## Management Response

DISTRICT ORGANIZATION AND MANAGEMENT

	Recommendation	Concurrence and Corrective Action Plan	Proposed Completion Date
1-R.1	Include cost-effectiveness measures in the evaluation of the Family and Community Partnership Department programs to ensure program outcomes justify resources used.	<b>Accept</b> The Department of Family and Community Partnerships currently evaluates all events, but MNPS agrees a more comprehensive annual assessment of the department is needed and should be developed.	July 2015
1-S.1	Convene a bi-annual meeting with all major community partners to plan and discuss goals, roles and responsibilities and expected program outcomes.	<b>Accept</b> The Support Services Department currently meets with community agencies engaged in the Community Achieves process three to four times per year, but this convening does not effectively reach all community partners working with the district. This observation would most effectively be accomplished as a function of the School Board's Community Engagement Committee.	August 2015
1-T.1	Explore adopting a system-wide coupon book sale fundraiser to provide supplemental resources for school programs.	<b>Reject</b> Decision-making around which fundraisers should or should not be conducted are made autonomously by each school leader in conjunction with his/her school leadership teams and supporting parent/community organizations.  During a principals' meeting in early 2014, a presentation regarding sale of a coupon book was made to all principals as an option for participation. Principals would have to decide if the opportunity warranted further exploration or presentation to their schools.	N/A

## Board of Education Member Response – Tyese Hunter

DISTRICT ORGANIZATION AND MANAGEMENT

	Recommendation	Concurrence and Corrective Action Plan	Proposed Completion Date
<b>The Metropolitan Nashville Public Schools Board of Education should:</b>			
1-A.1	Provide targeted training for members of the board related to their roles and responsibilities in adhering to Policy Governance® to reduce the instances of board members’ involvement in day-to-day operations that undermines the director of schools’ authority.	<b>Accept</b>	
1-B.1	Conduct a series of teambuilding workshops to improve trust and communication among board members to enhance board deliberations for efficient and effective decision-making.	<b>Accept</b>	
1-C.1	Redesign the board’s standing and ad hoc committee structure to reflect contemporary best practices for organizing school board committees to improve governing performance.	<b>Accept</b>	
1-D.1	Complete the design of the board’s performance dashboard to provide board members with a tool to monitor the initiatives related to student achievement and administrative, financial, and operational performance.	<b>Accept</b>	
1-F.1	Conduct a strategic planning retreat to re-engage the board in the strategic planning process to review the goals, objectives, and strategies included in Education 2018: Excellence for Every Student.	<b>Accept</b>	

## Board of Education Member Response – Mary Pierce

DISTRICT ORGANIZATION AND MANAGEMENT

	Recommendation	Concurrence and Corrective Action Plan	Proposed Completion Date
<b>The Metropolitan Nashville Public Schools Board of Education should:</b>			
1-A.1	Provide targeted training for members of the board related to their roles and responsibilities in adhering to Policy Governance® to reduce the instances of board members' involvement in day-to-day operations that undermines the director of schools' authority.	<b>Accept</b>	June 2015
1-B.1	Conduct a series of teambuilding workshops to improve trust and communication among board members to enhance board deliberations for efficient and effective decision-making.	<b>Accept</b>	Now through December 2015
1-C.1	Redesign the board's standing and ad hoc committee structure to reflect contemporary best practices for organizing school board committees to improve governing performance.	<b>Accept</b>	Done
1-D.1	Complete the design of the board's performance dashboard to provide board members with a tool to monitor the initiatives related to student achievement and administrative, financial, and operational performance.	<b>Accept</b>	April 2015
1-F.1	Conduct a strategic planning retreat to re-engage the board in the strategic planning process to review the goals, objectives, and strategies included in Education 2018: Excellence for Every Student.	<b>Accept</b>	February/March 2015

## Board of Education Member Response – Will Pinkston

DISTRICT ORGANIZATION AND MANAGEMENT

	Recommendation	Concurrence and Corrective Action Plan	Proposed Completion Date
<b>The Metropolitan Nashville Public Schools Board of Education should:</b>			
1-A.1	Provide targeted training for members of the board related to their roles and responsibilities in adhering to Policy Governance® to reduce the instances of board members' involvement in day-to-day operations that undermines the director of schools' authority.	<b>Partially accept.</b> If there are instances of board members interfering in the school system's day-to-day operations, then training should be directed at individual board members, versus the whole board.	
1-B.1	Conduct a series of teambuilding workshops to improve trust and communication among board members to enhance board deliberations for efficient and effective decision-making.	<b>Reject.</b> Some board members have competing agendas driven by special interests and/or community concerns. Trust-building workshops are not going to solve that challenge.	
1-C.1	Redesign the board's standing and ad hoc committee structure to reflect contemporary best practices for organizing school board committees to improve governing performance.	<b>Accept.</b> I like this recommendation and, in fact, this work already has begun.	
1-D.1	Complete the design of the board's performance dashboard to provide board members with a tool to monitor the initiatives related to student achievement and administrative, financial, and operational performance.	<b>Accept.</b> Let's ensure alignment with the director's evaluation tool, which is in the process of being redesigned.	
1-F.1	Conduct a strategic planning retreat to re-engage the board in the strategic planning process to review the goals, objectives, and strategies included in Education 2018: Excellence for Every Student.	<b>Partially Accept.</b> This should occur following the appointment of a new director, with an eye toward granting the new leader the leeway to develop his or her own ideas in collaboration with the board.	

## Management Response

	Recommendation	Concurrence and Corrective Action Plan	Proposed Completion Date
Management of Metropolitan Nashville Public Schools should:			
2-A.1	Develop a plan for reducing the concentrations of high-poverty populations in existing K-8 magnet schools.	<b>Partially Accept</b> The district recognizes that in some K-8 magnet programs there are high concentrations of students who qualify for free and reduced lunch. However, the magnet school enrollment process is based on student and parent choice. The district added a recruiter in fall 2014 to assist schools in East Nashville and model Pre-K centers in their recruiting efforts. Beginning in the fall of 2015, the recruiter will also work with magnet schools.	Recruiter Hired: October 2014  Recruitment Efforts Ongoing
2-B.1	Identify and implement behavior management strategies that have been proven effective in reducing the need for disciplinary actions for all students and in reducing racial disparities in discipline.	<b>Accept</b> The district was selected to participate in PASSAGE (Positive and Safe Schools Advancing Greater Equity) in the summer of 2014. PASSAGE is an initiative being conducted by the Annenberg Institute that focuses on the reduction of discipline disparities. The district is currently modifying its student Code of Conduct and disciplinary practices to address this issue. In addition to PASSAGE, the district is utilizing the community school model to work with community agencies to identify partners and programs that have the ability to work with schools and students to address student behavior and the need for additional social and emotional support.	Summer 2015  Progress Monitoring Ongoing
2-C.1	Implement behavior management strategies that have been proved effective in reducing racial disparities in discipline, especially those associated with placement in disciplinary alternative education settings.	<b>Accept</b> In addition to the response to 2-B.1, the district has adopted the use of restorative practices to reduce suspensions and expulsions. In addition, the "Why Try" program will be expanded to include elementary and high school students in need of additional services and intervention. The district recognizes the need exists for a progressive discipline plan and is working with the state Department of Education to review and revise discipline codes and severity indexes.	Summer 2015

## Management Response

EDUCATION SERVICE DELIVERY

	Recommendation	Concurrence and Corrective Action Plan	Proposed Completion Date
2-D.1	Increase the ethnic and language diversity of the ENCORE program by including assessments that are effective in the identification of gifted students from underrepresented populations.	<b>Accept</b> Beginning in fall 2014, CogAT (Cognitive Abilities Test) Form 7 (updated from Form 6) was administered to all qualifying students. Research studies show that CogAT Form 7 is more effective in identifying students from under-represented groups, such as students with limited English proficiency. In the 2015-16 school year, the HOPE Scale will be used as a screener for the identification of K-1 gifted and talented students. The HOPE Scale is a useful measure to identify students from low-income families and minority backgrounds. In the spring of 2016, after a review of the impact of these new measures on the composition of Encore participation, the use of alternate assessments (i.e., Naglieri, Ravens) will be considered for subsequent years. Additionally, the use of local/school norms may be used to identify gifted/talented students in certain schools that have had historically low participation in Encore.	2015-2016; further review for 2016-2017
2-E.1	Evaluate the intervention process to identify factors contributing to the large number of non-qualifying referrals for special education services.	<b>Accept</b> S-Team (Support Team) training has been revised to reflect the State Response to Intervention and Instruction Model (RTI 2 - 11/2014) and is currently being rolled out district-wide. Non qualifying referrals are being tracked for state indicators. During the 2009-2010 school year, MNPS was utilizing a new data system and data quality was not as consistent as it is now. The district will continue to use data to refine the S-Team process. It is important to note that not all referrals for special education go through an S-team process. Additionally, MNPS has a legal obligation to honor parent requests for assessments, whether or not district employees suspect a disability.	Ongoing through 2015-2016
2-F.1	Conduct a time and task analysis of direct services, indirect services, and non-counseling services being provided by	<b>Accept</b> The Executive Director for School Counseling will create a survey	May 2015

## Management Response

	Recommendation	Concurrence and Corrective Action Plan	Proposed Completion Date
	counselors to determine how their time is being allocated.	instrument for school counselors to gather data on tasks. The survey will be administered in late February 2015 and the final report will be submitted to the Chief Academic Officer in May.	
2-G.1	Conduct an operational review of the Students Health Services program to address staffing levels, nurse-to-student ratios, and the allocation of nurses across campuses.	<b>Partially Accept</b> The district currently conducts an annual operational review. This process is conducted in partnership with the Metropolitan Nashville Health Department and evaluates program implementation, performance and staffing. As a result of this process, five additional nurses were added in the fall of 2014. All schools currently have nursing services and MNPS continues to evaluate the need for additional services.	Operational Review conducted annually
2-H.1	Implement the 2014 program evaluation, identifying areas where improvement is needed and develop an implementation and evaluation plan.	<b>Reject</b> As stated in 2-G.1, the district currently provides nursing services for all schools and a process exists to evaluate program effectiveness and the need for additional services. Implementation of this recommendation would result in a significant budget increase in student health services.	N/A
2-I.1	Increase all high school library collection to the 12 items per student to meet the state minimum standard.	<b>Accept</b> The office of school librarians will submit the cost to fully fund the high school library collections in the FY15-16 budget.	January 2016

## Management Response

IMPACT OF CHARTER SCHOOLS ON METROPOLITAN NASHVILLE PUBLIC SCHOOLS

	Recommendation	Concurrence and Corrective Action Plan	Proposed Completion Date
Management of Metropolitan Nashville Public Schools should:			
3-A.1	<p>Include a provision in charter school agreements that allows for authorizer oversight fees, and develop a cost allocation plan to that supports the fees, which should be charged to charter schools that benefit from the School System’s administrative services.</p>	<p><b>Accept</b>            MNPS accepts this recommendation, realizing that agreement of existing charter operators and/or state-level legislation is required to realize this goal. A study of fixed and variable costs associated with adding charter schools is underway. The goal of this work is to produce a list of required services and their costs that all charter schools bear as well as a list of optional services and their costs that charters may choose to purchase on an annual basis. Provided that we reach agreement through this process, the agreed services and costs list will be added to all new or renewal charter agreements approved after July 1, 2015. Provided that we reach agreement through this process, we will also seek approval for the provision to be added to all current charter school agreements by July 2015.</p> <p>MNPS will develop an annual process for selection of optional services, billing for services and required fees, and any other processes required to enable transparent billing and collection procedures.</p>	July 2015
3-B.1	<p>Move quickly to address problems of low performing schools throughout the district. Charter schools are one tool that can be used to transform school performance.</p>	<p><b>Accept</b>            MNPS agrees with the urgency in addressing low performing schools and that charter school conversions are one tool that can be used. These conversions should be used as high quality capacity is available, but not rushed beyond that capacity to succeed.</p> <p>The district was the first in the state to use charter school conversion as a plan to address needs of a low-performing school at Cameron Middle. That conversion is now complete and both the charter grades and the MNPS turnaround grade were recognized as Reward schools for their growth in 2013-14. MNPS</p>	July 2015

## Management Response

IMPACT OF CHARTER SCHOOLS ON METROPOLITAN NASHVILLE PUBLIC SCHOOLS

	Recommendation	Concurrence and Corrective Action Plan	Proposed Completion Date
		<p>included charter school conversion of low-performing schools in its 2014 Call for New Schools, and conversion of Kirkpatrick Elementary (Priority) was approved to begin in the fall of 2015. This model created by MNPS has been adopted by the state's Achievement School District.</p> <p>MNPS will establish a school management system organized around the Academic Performance Framework the district uses to provide both annual snapshots and three-year trend analysis of the balanced academic performance of all district schools. The district will develop an annual action plan for all target and review schools that includes annual notification, parent engagement, and clear communication of potential turnaround actions and timelines to include the potential for charter school conversion in future years.</p> <p>The district has also engaged an external consultant, Mass Insight, to assess and recommend organizational structures that will support this accountability work. Recommendations from this work are due spring 2015.</p>	
3-C.1	Increase communication and sharing of information on effective practices between charter schools and public schools to maximize instructional, administrative and financial resources.	<p><b>Accept</b></p> <p>Management agrees with this recommendation but notes that the observation of "little" effective communication understates the genuine collaboration and support that exists between district and charter school personnel. Examples include:</p> <ul style="list-style-type: none"> <li>• Public School Collaborative</li> <li>• Benefits Administration Work Group</li> <li>• Shared Services Contracting Work Group</li> <li>• Coding Curriculum and Instruction Partnership (NACS)</li> <li>• Teacher Data and Formative Assessment PD (STEM)</li> <li>• Shared Formative Assessment Creation (Liberty)</li> <li>• Transportation and Conversion Costs Support (LEAD)</li> </ul>	October 2015, ongoing

## Management Response

IMPACT OF CHARTER SCHOOLS ON METROPOLITAN NASHVILLE PUBLIC SCHOOLS

	Recommendation	Concurrence and Corrective Action Plan	Proposed Completion Date
		<ul style="list-style-type: none"> <li>• Blended Instruction Shared Practices (Rocketship)</li> <li>• School Finder (TCSC, NPEF, MNPS)</li> <li>• Academic Performance Framework</li> <li>• Leadership Development and Mentoring (KIPP)</li> </ul> <p>Nevertheless, greater intentionality and building sustaining structures can only help to ensure that the benefits of collaboration are shared more broadly and make this recommendation well worth accepting.</p>	
3-C.2	Encourage communication and collaboration among charter schools to maximize instructional, administrative and financial resources.	<p><b>Partially Accept</b>            MNPS partially accepts this recommendation and notes it is primarily a charge for charter operators to execute rather than something under the control of district leadership. MNPS again notes that the observation of “little” effective communication understates the genuine collaboration and support that does exist among charter school leaders and other personnel.</p> <p>The Coordinator of Charter Schools regularly convenes groups of charter personnel with similar responsibilities to help spur further collaboration and work to eliminate barriers to collaboration that may arise through interaction with various district departments. Operations personnel meet regularly, and other specific topics draw charter-charter collaboration around transportation, food service, and other. Likewise, the Public Schools Collaborative has established a working group on employee benefits that is exploring ways that charter operators and the district can build better processes to everyone’s benefit.</p> <p>These recommendations would require additional staff of 1.5-2.0 FTE in the charter schools division to establish, lead, and maintain, in addition to the authorizing, reporting, research and oversight</p>	October 2015

## Management Response

IMPACT OF CHARTER SCHOOLS ON METROPOLITAN NASHVILLE PUBLIC SCHOOLS

	Recommendation	Concurrence and Corrective Action Plan	Proposed Completion Date
		functions already fulfilled by the Charter Office.	
3-D.1	Consider persistently low-performing campuses that are currently underutilized as potential sites for “in-school” charter programs, that is, charters that share a building with a traditional school, and school clusters that currently have campuses at which utilization rates are 100 percent or more as sites for future stand-alone charter schools.	<b>Reject</b> Low-performing schools are addressed in the response to 3-B.1 above. This recommendation aligns with the recommendations in the MGT report that have been incorporated into the current draft of the 2015 Call for New Schools.	N/A

## Management Response

HUMAN CAPITAL

	Recommendation	Concurrence and Corrective Action Plan	Proposed Completion Date
Management of Metropolitan Nashville Public Schools should:			
4-A.1.	Develop a comprehensive project plan to capture, monitor, and report in all Human Capital Services Department initiatives.	<b>Accept</b> The MNPS Human Capital Department will utilize a project manager to plan the comprehensive initiatives within the division.	April 2015
4-A.2	Align employee activities within the department to report to the appropriate function leader.	<b>Partially Accept</b> Human Capital has realigned the employee service center personnel to HC Tier Partners.	December 2014
4-A.3	Assign additional staff to performing workplace safety functions.	<b>Partially Accept</b> Human Capital is considering the realignment of staff assignments to support the workplace safety functions.	December 2014
4-A.4	Consider assigning employee service center staff workloads based on schools and departments.	<b>Accept</b> Human Capital has realigned the employee service center personnel to HC Tier Partners.	December 2014
4-B.1	Include all reasons for teacher separation in the teacher retention calculation.	<b>Accept</b> Human Capital is in the process of developing a strategic retention plan for teachers and support staff. The plan will include an assessment of threats to retention of high quality staff, action steps to address those threats, and metrics to measure progress.	February 2015
4-B.2	Develop a plan to stabilize teacher retention.	<b>Accept</b> Human Capital is engaging principals to begin developing a comprehensive, multi-year retention plan for the district's high performing teachers. The plan will be developed throughout the spring, 2015, and will be implemented in summer 2015-16.	September 2015
4-C.1	Establish a task force to determine projected cost savings, benefits, and implications of all School System employees being covered under the School System's employee benefit plan for health and retirement benefits.	<b>Partially Accept</b> MNPS understands this recommendation would have to be led by Metro Government.	TBD
4-D.1	Conduct formal compensation studies on a regular basis to	<b>Accept</b>	July 2015

## Management Response

HUMAN CAPITAL

	Recommendation	Concurrence and Corrective Action Plan	Proposed Completion Date
	ensure market competitiveness.	The job description for the compensation position in Human Capital requires regular studies of market competitiveness.	
4-E.1	Develop and implement a checklist to standardize the contents of personnel folders.	<b>Accept</b> Human Capital has implemented a checklist to standardize personnel folders.	October 2014
4-E.2	Require Human Capital staff to use the checklist.	<b>Accept</b> Human Capital has implemented a process to ensure all Human Capital staff connected with new hire files follow the checklist protocol established within 4-E.1.	October 2014
4-E.3	Purge electronic folders to remove extraneous documents.	<b>Partially Accept</b> Human Capital does not have current resources necessary to review and redact 14,000 employee files of possible extraneous documents. The department did review and redact files prior to the files being digitally scanned and has implemented a process that ensures any extraneous documents to an employee file are removed at the time a file is requested due to open records requirements or transfer to Metro Legal.	TBD
4-E.4	Determine which required documents are missing from active employee files then obtain the documents and add to the electronic folders.	<b>Partially Accept</b> Human Capital does not have current resources necessary to review and determine which required documents are missing from active employee files, obtain the documents and add to the electronic folders of 14,000 employee files.  The department has implemented a process to ensure all Human Capital staff connected with new hire files follow the checklist protocol established within 4-E.1. Human Capital has implemented a process to obtain required documents that are missing from active employee files and add those documents to the electronic employee file when a file is requested due to open records requirements or transfer to Metro Legal.	TBD

## Management Response

	Recommendation	Concurrence and Corrective Action Plan	Proposed Completion Date
Management of Metropolitan Nashville Public Schools should:			
5-A.1	Use a risk-based audit approach to plan the nature, timing, and extent of audit procedures; select audit samples; and allocate staff resources.	<b>Accept.</b> A risk assessment was completed in September 2014 and used to plan the nature, timing, and extent of audit procedures for the 2014-2015 school year. Auditors attended two days of training to learn how to develop risk assessments, calculate materiality limits and develop sample sizes based on risk and materiality of the auditee. This risk-based format will ensure staff resources are allocated properly.	December 2014
5-B.1	Enforce accountability for addressing and resolving internal school fund audit findings by conducting follow up audits, including principal responses in audit reports, requiring schools to prepare formal corrective action plans, tracking audit deficiencies for discussion, and making audit results a criteria in principal evaluations.	<b>Partially Accept.</b> Documented audit responses from principals are required for all audit findings beginning with the fiscal year ending June 30, 2014. Responses are reviewed by Executive Lead Principals, officers and Internal Audit manager for completeness. Formal corrective action plans will be required for significant or recurring audit findings.  Internal Audit is tracking audit deficiencies, and follow-up audits are being performed. To date, six follow-up audits have been completed. Audit results are already incorporated into the Tennessee Educator Acceleration Model (TEAMTN) Administrator Evaluation Rubric with Standard D3.	July 2014  Ongoing, begun September 2014
5-C.1	Strengthen controls over the bi-annual physical inventory that is organized by the fixed asset accountant.	<b>Accept</b> Because of the difficulty the fixed asset accountant has in gathering returned reports and updating the physical inventory reports for the capital asset system, these items are going to be added to the physical inventory of sensitive items completed annually by the Inventory Team. This transition is scheduled to begin January 2015.	July 2015
5-C.2	Require that the serial number, asset number, and model number be placed on the surplus equipment form so that this data can be	<b>Partially Accept</b> These information items are already included on the surplus	November 2014

## Management Response

FINANCIAL MANAGEMENT

	Recommendation	Concurrence and Corrective Action Plan	Proposed Completion Date
	captured and used by the fixed assets clerk to remove surplus assets from the fixed assets system.	equipment form; however, MNPS has updated this form to show these information items as required fields to be completed.	
5-D.1	Use imaging and e-mail technology to send journal vouchers and related supporting documentation to Metropolitan Nashville Government's Accounting Department, and discontinue using the FASTpak to send paper documents through interoffice mail.	<b>Partially Accept</b> Upon inquiry to the Metropolitan Nashville Government's Finance Department in September 2014, MNPS found this change is not currently an option. MNPS management will work with Metropolitan Government's Finance and Information Technology Services Departments to explore other options.	TBD
5-E.1	Require the public to pay in advance for field trips and school facility rentals.	<b>Reject (Field Trips)</b> Field trips are not based on a flat rate scale and therefore cannot be pre-billed. Field trips are billed based on driver hours and miles driven. This cannot always be determined ahead of time, so billing cannot take place until after the field trip. Field trips are only engaged by schools and teachers for the students under their care. The public does not use MNPS buses.  <b>Reject (School Facility Rental)</b> Organizations that use MNPS facilities are required to pay in advance for the cost of rental prior to use. This excludes personnel costs for custodial and food services, which are billed afterward. MNPS custodial service is outsourced and must be approved by the renter after each event before any billing occurs. Food service costs are difficult to pre-bill as well because they are billed on actual hours used. To avoid over billing, MNPS bills for the actual cost after each event.	N/A
5-F.1	Use prepaid business credit cards to distribute Basic Education Program funds, and eliminate the practice of adding funds to teacher paychecks at the beginning of each school year.	<b>Reject</b> The accountability and documentation required for credit card use to spend BEP funds would be the same as the current process (card issue and maintenance administration, card usage tracking for fraudulent/unauthorized use or compromise, receipt collection and audit for authorized expenditures, etc.), so credit	N/A

## Management Response

FINANCIAL MANAGEMENT

	Recommendation	Concurrence and Corrective Action Plan	Proposed Completion Date
		cards offer no benefit in that regard. The financial benefit (rebate) from card usage would be approximately \$2,000 per year, which is more than offset by the additional administrative burden to issue, track, reconcile, and close out credit cards (based on the current administrative requirements for district p-cards).	
5-G.1	Configure the Web Requisition system for limited access for charter schools to initiate electronic purchase requisitions.	<b>Reject</b> Providing charter schools with access to the MNPS systems for requisition/purchase includes both the web requisition system (for requisition entry and approval) and the Oracle Enterprise One system (for purchase order approval, print and mail, recording receipts, and generating purchase order and financial reconciliation reports). MNPS currently prohibits access to these systems by charter schools (or any other non-Metro legal entity) because the systems do not have user access profile restrictions to prevent a charter school from accessing and manipulating MNPS financial data. Conservatively, the cost to install system logic that ensures restricted access by charter schools would be approximately \$85,000. This figure may be significantly understated as the magnitude and breadth of system code that would be impacted by this change (and need secondary re-writing) is unknown.	N/A
5-H.1	Issue purchase orders for all contracted vendors and eliminate direct pay.	<b>Partially Accept</b> As noted in the report, there are some contracted vendors with whom purchase orders yield no benefit (utilities, banks, charter schools, employee benefit providers, etc.). A systematic collaboration between Purchasing, Accounts Payable, and selected departments has already reduced direct pay expenditures to the non-utility vendors shown in Exhibit 5-10 to half the cumulative amount shown in the Exhibit.	July 2015

## Management Response

	Recommendation	Concurrence and Corrective Action Plan	Proposed Completion Date
5-1.1	Strengthen the contractor performance evaluation process by establishing written procedures and tools, and centralize retention of the evaluations.	<p><b>Accept</b></p> <p>A written policy and procedure for contract management will be created that prescribes and documents contracted vendor evaluation.</p>	April 2015

## Management Response

	Recommendation	Concurrence and Corrective Action Plan	Proposed Completion Date
Management of Metropolitan Nashville Public Schools should:			
6-A.1	Complete the planning components necessary to implement a fully-integrated 10-year Facilities Master Plan that addresses system-wide needs.	<p><b>Accept</b></p> <p>Facility Planning and Construction will work to develop and execute the missing components necessary to complete the 10-Year Facilities Master Plan. A major requirement is to include a community engagement plan in the process. The Communications Office is currently developing a complete communication engagement process with input from the Board.</p> <p>The existing process for interaction with the district's Leadership and Learning Division will continue to be refined to capture future educational and program changes through revisions to the MNPS Educational Specifications. These changes will be reflected in the Facility Standard Space Guide and Design Guidelines.</p> <p>MNPS will also combine all aspects of the current and expanded evaluation and planning activities into a formal 10-year Master Plan Document. This document will include metrics to evaluate effectiveness of the plan and establish procedures for modifications required by receiving capital funding on a single year basis.</p> <p>As recommended, MNPS will seek to work with an educational planning consultant to assist in-house teams in developing the master plan. Funding for this effort is requested in the current Capital Improvement Budget.</p>	January 2016
6-B.1	Develop and implement a process to conduct post-occupancy evaluations of major construction projects.	<p><b>Accept</b></p> <p>Facility Planning and Construction is revising an existing post-occupancy evaluation form. The revised form will be deployed January 2015 for projects completed during the 2014-2015 school year. The evaluation forms will be provided to district administrative personnel, executive lead principals, principals,</p>	January 2015

## Management Response

FACILITIES MANAGEMENT

	Recommendation	Concurrence and Corrective Action Plan	Proposed Completion Date
		teachers, parents and community members, along with staff from Facility and Grounds Maintenance, custodians, Safety and Security and Technology.	
6-C.1	Optimize school facility utilization in all clusters as a component of the facility master planning process.	<b>Partially Accept</b> MNPS agrees in principle with the fiscal benefits of optimal facility utilization and strives to reach this goal where it is practical. However, the district considers facility use along with many other factors when determining the best way to serve the educational needs of all students. Recent and continuing spikes in Metro Nashville's population growth, as well as the expansion of the charter school initiative, have spurred significant student population shifts at a pace that has exceeded Metro Nashville's annual budgeting and related land-use and construction processes.	Ongoing
6-D.1	Develop an allocation model to determine the appropriate staffing levels for the Facility & Grounds Maintenance Department to enhance productivity levels in the most efficient, cost-effective manner.	<b>Accept</b> The MNPS Facility & Grounds Maintenance Department's staffing levels for maintenance/repairs are currently less than other organization recommendations, including the Florida Department of Education (Florida Center for Community Design & Research) referenced in the final performance audit report. MNPS will continue to monitor and compare with similar organizations.	April 2015
6-E.1	Expand the geographic zone approach for deployment of trade staff for routine, preventative, and emergency maintenance needs.	<b>Accept</b> Several Facility & Grounds Maintenance Department shops are already dispatched following a zone concept. MNPS will continue to expand the zone dispatch to all shops applicable to a zone concept to maximize efficiencies.	April 2015
6-F.1	Provide extensive training on the management reporting and analytical capabilities of the SchoolDude Maintenance Direct work order management system.	<b>Accept</b> MNPS has completed an extensive discussion with the manufacturer of the School Dude system concerning the available management reports. MNPS will continue to utilize SchoolDude data to improve the efficiency and effectiveness of the Facility &	April 2015

## Management Response

	Recommendation	Concurrence and Corrective Action Plan	Proposed Completion Date
		Grounds Maintenance Department. Not all of the noted management reports are useful to the MNPS maintenance operations, but use of additional management reports will be expanded to identify work order and work management trends.	
6-G.1	Enhance the School System's preventative maintenance program by developing and implementing a formal, documented preventative and predictive program containing regularly scheduled maintenance and repair activities	<b>Accept</b> MNPS will develop and implement a documented preventative maintenance program for HVAC, plumbing, electrical, electronics and carpentry work centers.	Pilot HVAC PM implemented December 2014; All schools HVAC – October 2015
6-H.1	Develop and maintain a deferred maintenance plan.	<b>Accept</b> A deferred maintenance plan is in use as a worksheet of the Capital Improvement Budget process, but a formal deferred maintenance plan will be developed. The district has requested funding to outsource the development of a detailed Facility Condition Report. This detailed report will enhance the current process and provide additional documentation and justification for requests.	April 2015
6-I.1	Perform a training needs assessment and develop an annual training plan to improve the overall skills and efficiency of Facility & Grounds Maintenance staff.	<b>Accept</b> A comprehensive annual training plan will be developed by the Facility & Grounds Maintenance Department ensuring enhancement of safety practices, use of technology, and technical skill continuing education.	February 2015
6-J.1	Hire an in-house energy manager to provide a central point of oversight and accountability to control energy costs.	<b>Accept</b> The Facility & Grounds Maintenance Department will request funding and hire an in-house energy manager for oversight and accountability of energy costs.	September 2015
6-J.2	Develop and implement a comprehensive energy management program.	<b>Accept</b> The Facility & Grounds Maintenance Department will develop and implement a comprehensive energy management program and energy conservation plan.	April 2016

Chapter 6 - Alternative Sourcing Recommendation (page 6-68).		
<p>Proceed with a competitive request for proposal process to outsource the maintenance department and energy management program to a national facility management outsource provider for 2015-2016.</p>	<p><b>Reject</b> Existing staffing levels are less than the recommended levels by all maintenance standards. Current MNPS maintenance staffing is 1 FTE for 90,000 square feet. Florida Center for Community Design &amp; Research recommends 1 FTE for 45,000 square feet as referenced in the performance audit report. MNPS disagrees with the performance audit calculations for staffing and potential cost savings. Exhibit 6-44 and 6-45 references the Association of Higher Education. Association of Higher Education is a higher education association and recommended staffing levels are not comparable to required staffing for K-12 educational districts. MNPS will continue to monitor staffing levels and identify benchmark standards for comparable school districts to determine future staffing needs.</p> <p>MNPS rejects the recommendation to outsource the energy management program, but the school district plans to request funding to hire an MNPS energy manager for FY2015-2016. The MNPS energy manager will be responsible for development and implementation of a comprehensive energy management program that includes a written energy conservation plan. This corrective action plan aligns with Recommendation 6-J.2.</p>	<p>N/A</p>

## Management Response

	Recommendation	Concurrence and Corrective Action Plan	Proposed Completion Date
Management of Metropolitan Nashville Public Schools should:			
7-A.1	Develop and implement Nutrition Services operating and financial plans.	<p><b>Accept</b></p> <p>MNPS Nutrition Services has established operational goals which are a combination of ongoing and annual goals. These goals are in line with Key Performance Indicators (KPIs) the Council of Great City Schools uses to evaluate nutrition service in its member districts. Periodic meetings with members of supervisory staff provide input and constructive criticism regarding operations that are used to advise the Nutrition Services director toward final decisions.</p> <p>The Nutrition Services director will work to formally create the department vision utilizing input, collaboration and feedback from department members, students, parents, and the community. This input will be part of planning annual budgets and making appropriate operating decisions.</p>	August 2015
7-A.2	Integrate performance standards into the School System's campus food service operations.	<p><b>Reject</b></p> <p>MNPS Nutrition Services historically and currently utilizes the Council of Great City Schools (CGCS) KPIs (Key Performance Indicators) as the comparative data for the operation of the department. MNPS has identified the CGCS KPIs as the most comparable data to use for performance standards for a large school system operation. In addition to these Key Performance Indicators, data from other Tennessee departments is used for comparison to benchmark local performance. Nutrition Services will continue to utilize the CGCS performance standards to guide and evaluate its operation.</p>	N/A
7-A.3	Develop and implement a Nutrition Services marketing plan.	<p><b>Accept</b></p> <p>Nutrition Services is constantly working on methods to improve food quality, staff service and the dining area environment. Currently, staff tests all new products with student panels before</p>	July 2015

## Management Response

NUTRITION SERVICES

	Recommendation	Concurrence and Corrective Action Plan	Proposed Completion Date
		adding to the menu. This provides valuable feedback regarding student taste preferences as employees work to provide healthy and tasty meals. Nutrition Services has hired a chef whose primary function is to help improve food quality in terms of taste, presentation and consistency within budgetary guidelines. Presently, the chef is helping improve one school at a time; the department realizes it will need to explore electronic/video methods to reach more café staff. A formal plan will be created and introduced.	
7-A.4	Generate annual reports that document the Nutrition Services accomplishments, innovative practices, and successful initiatives.	<b>Accept</b> This recommendation will be incorporated into the planning and development of the district's strategic communications plan. Nutrition Services does document and promote its positive accomplishments through presentations to the Board of Education and through district, local, state and national mediums. Additionally, Nutrition Services won the 2014 TN Department of Education and the USDA Best Practice Awards for "Creating a Healthier School Environment" for its committee work with Alignment Nashville.	June 2015
7-B.1	Develop and approve a Nutrition Services long-term facilities and equipment plan.	<b>Partially Accept</b> Nutrition Services does not have a formal capital replacement plan. However, the department does evaluate capital equipment needs annually and documents capital equipment issues throughout the year. The department works diligently to keep all capital equipment in good working order and uses both in-house and contractors for equipment repair. After a thorough evaluation is complete, the request for equipment is included in the annual budget. It is not financially feasible for Nutrition Services to rely heavily on the age of equipment as the primary factor for replacement.	February 2015

## Management Response

NUTRITION SERVICES

	Recommendation	Concurrence and Corrective Action Plan	Proposed Completion Date
		Nutrition Services does have a kitchen equipment inventory standard regarding production equipment housed in cafés. Prior to the audit, Nutrition Services was actively working toward development of a fixed asset inventory, which was completed in the summer of 2014.	Inventory completed Summer 2014
7-C.1	Reduce payroll costs by 10 percentage points of 2012-13 departmental total payroll over the next five years.	<p><b>Reject</b></p> <p>MNPS Nutrition Services is limited in its ability to reduce payroll costs as suggested in this recommendation. Employees receive the same salary increases and benefits as all other MNPS employees. Support employee benefits are the responsibility of the Metro Benefit Board operated by Metro General Government, which also defines a full time employee eligible to receive benefits as anyone working 20 hours or more per week.</p> <p>Nutrition Services competes for employees from a pool that has many hospitality employment opportunities from around the city. The department has successfully navigated higher labor costs by utilizing part-time employees, using six- and seven- hour workers instead of eight-hour workers, and choosing to cluster some schools for manager supervision. Work hours are considered against the backdrop of the city's available employee pool and the cost of employee turnover and training.</p>	N/A
7-D.1	Increase student breakfast and lunch participation at system schools.	<p><b>Accept</b></p> <p>In August 2014, MNPS Nutrition Services implemented the Community Eligibility Program. This is a USDA program for high needs school systems to allow the entire school or district's students to eat breakfast and lunch at no cost to the student. A comparative analysis shows an average increase of 20,000 meals per day over the same period last year.</p>	August 2014

## Management Response

NUTRITION SERVICES

	Recommendation	Concurrence and Corrective Action Plan	Proposed Completion Date
		Participation has been boosted to about 46% of ADA at breakfast, which is above the CGCS median of 29%, and about 78% of ADA at lunch, which is above the CGCS median of 58%. Nutrition Services has expanded the breakfast in the classroom program with the addition of sites in 2014-2015 and continues to promote expansion through communication with site principals and staff.	
7-E.1	Establish centralized training and testing kitchens at select school locations.	<b>Partially Accept</b> While this recommendation is for several test kitchens, MNPS Nutrition Services is collaborating with the Facilities Planning and Construction Department to relocate its central operations and training facilities, as well as create a test kitchen and satellite production model. Several sites have been considered and needs assessments have been created. At this point, a workable, acceptable site has not been located. As this plan is created, it will also include capital funding necessary to remodel the facility for Nutrition Services and other joint MNPS uses.	Dependent upon site availability and capital funding
7-E.2	Reassign field managers to select School System schools based on geographic locations.	<b>Accept</b> MNPS agrees with this recommendation and notes that assigning field managers based on geographic locations is the existing practice for Nutrition Services. MNPS has historically assigned all but one field to schools based on geographic area. The field manager not assigned per geographic area is the person who oversees all high school cafés.	Already in place
7-E.3	Develop and implement more comprehensive field manager site visitation procedures.	<b>Accept</b> Standardized site visit forms will be developed and included in manager evaluation documentation.	August 2015
7-E.4	Increase the role of field managers in completing cafeteria manager performance evaluations.	<b>Accept</b> MNPS Nutrition Services is implementing a more comprehensive management evaluation tool that will include input from the school principal, but will be the responsibility of the field manager to complete. This is a change from previous evaluations	August 2015

## Management Response

	Recommendation	Concurrence and Corrective Action Plan	Proposed Completion Date
		which were completed by the school principal.	
7-F.1	Initiate a contract with an armored car service or certified law officers to transport cash from schools to banks for deposit.	<p><b>Partially Accept</b>            MNPS has implemented the Community Eligibility Provision program and is providing meals at no cost to all students. (see 7-D.1) As expected, daily cash collections have dropped significantly. Armored car pick up and the placement of safes in facilities have been discussed over the years. Risk management and costs continue to be weighed and assessed. The report's recommendation will be given consideration and discussed in collaboration with other applicable departments.</p>	January 2015
Chapter 7 - Alternative Sourcing Recommendation (page 7-39).			
	If labor cost reductions are not achieved by the end of 2016-2017, the School System should proceed with an outsource request for proposal process.	<p><b>Partially Accept</b>            Labor cost comparisons show that while salary scales for Nutrition Services are comparable to other school systems, Metro General Government benefits have better employee options at slightly more cost than comparable school nutrition operations.</p> <p>Various configurations can be used to achieve successful operation of school nutrition programs in a school district. Shared services and outsourcing are among them. MNPS Nutrition Services has had a solid history of being regulatory compliant and fiscally responsible while serving a large population of students. Varying philosophies abound surrounding what a successful program looks like, the role of school nutrition programs in education, as well as the role of MNPS being an employer in the city. These, along with revenues and operating costs, are considered in determining desired program strategies and outcomes when making business and operating decisions. Currently, MNPS Nutrition Services chooses to maintain business operations in-house while always seeking revenue opportunities</p>	Ongoing

## Management Response

NUTRITION SERVICES

	Recommendation	Concurrence and Corrective Action Plan	Proposed Completion Date
		<p>and cost efficiencies. The performance report's summary of recommendations will further aid the department in planning and building on its strong child nutrition programs. Implementation of the Community Eligibility Provision in the 2014-15 school year has increased meal participation by an average of 20,000 meals per day. At this point, consideration for outsourcing is not relevant to the current operation.</p>	

## Management Response

TRANSPORTATION

	Recommendation	Concurrence and Corrective Action Plan	Proposed Completion Date
Management of Metropolitan Nashville Public Schools should:			
8-A.1	Reimburse the Transportation Department budget for expenses related to field trip expenditures.	<b>Partially Accept</b> This is a decision that must be made in context of the overall financial operations of MNPS. This will be studied and discussed during the 2015-2016 budget planning process; however, it is important to note that if implemented it will not impact the overall district budget since MNPS funds the transportation budget as part of its district operating budget.	July 2015
8-B.1	Fill the vacant exceptional needs route planner position, and hire one route planner for regular education and one route planner for exceptional education.	<b>Accept</b> Because of the current and ongoing implementation of a new school transportation software package, there will be necessary restructuring of the route planning and field trip planning functions of the department. The department has engaged the services of a transportation consultant to advise and support the restructuring and implementation of the new operating procedures, functions, and operations.	August 2015
8-C.1	Invest in a fleet maintenance management system with a robust inventory management module, which is critical to repair parts cost control and inventory management.	<b>Accept</b> New fleet maintenance software will be implemented in January 2015. This software includes a comprehensive inventory control system that is fully integrated with preventative maintenance and generates reports of the life cycle of every part in inventory. The fleet management application will have automated inventory controls using universal bar codes and other state-of-the-art inventory functionality.	January 2015
8-C.2	Develop inventory management procedures to guide the decision making process relative to stock and non-stock parts and operational practices.	<b>Accept</b> Fleet maintenance software will be implemented in January 2015. See response in 8-C.1.	January 2015
8-C.3	Assess current stocking levels and establish and maintain bids and formal contracts for all parts procurement.	<b>Accept</b> This process has been expanded and formalized with the functionality of the new transportation software and assistance from the MNPS Purchasing Department.	August 2014

## Management Response

TRANSPORTATION

	Recommendation	Concurrence and Corrective Action Plan	Proposed Completion Date
8-C.4	Acquire and implement an effective fleet management information system and develop a parts contracting process.	<b>Accept</b> A contracting/bidding process for parts was developed in collaboration with MNPS Purchasing and implemented in August 2014. Fleet maintenance software will be implemented in January 2015.	Parts contracting August 2014 Fleet Management January 2015
8-D.1	Provide additional staffing resources to the maintenance operation.	<b>Accept</b> Pending budget approval for the additional FTEs.	July 2015
8-E.1	Expand the scope of the preventive maintenance program.	<b>Accept</b> Based on the recommendations from consultants, MNPS will implement the recommendation by March 2015.	March 2015
8-F.1	Revise fuel management procedures to improve data available for maintenance services and analysis.	<b>Accept</b> This recommendation will be implemented in February 2015 as part of the implementation of new fleet management software. This software includes a comprehensive fuel management/reporting function that is fully integrated with preventative maintenance and will generate reports for the life cycle of every MNPS vehicle.	February 2015
8-G.1	Review existing onsite fueling services to determine whether a modernized fuel management system is warranted.	<b>Accept</b> A cost/benefit analysis will be performed by MNPS internal audit to determine the feasibility of a fuel management system for the on-site pumps. These pumps are locked and utilized by very few white fleet vehicles with limited availability.	March 2015
8-H.1	Remove bus assignment procedures from the 2011-12 Driver's Manual and assign as a management responsibility.	<b>Accept</b> Route bidding procedures will be deleted from the driver's manual and reasonable cost-effective driver assignment procedures will be established based upon MNPS need and not driver seniority.	Summer 2015
8-I.1	Develop a long-term capital replacement schedule and financing plan to support both school bus and white fleet replacement.	<b>Partially Accept</b> MNPS has a capital funding plan that includes all capital funding requests across the district. There is a 10-year plan and annual requests for capital funding. Allocation of funds is based on Mayor and Council Approval. Funding is available for some years, but not	Already in place

## Management Response

TRANSPORTATION

	Recommendation	Concurrence and Corrective Action Plan	Proposed Completion Date
		in others. This makes it difficult to plan long-term. The transportation department does have a bus replacement schedule that is based upon state law and maintenance history that shows the break point on years of service, mileage, and safety.	
8-J.1	Continue efforts to acquire, implement, and integrate a fully functional fleet management information system as soon as feasibly possible.	<b>Accept</b> MNPS purchased new school transportation software in August 2014. Implementation began October 2014. This is a comprehensive fully integrated fleet management software package that includes many features such as: bus management and maintenance, tools to allow parents and students to look up bus stops and estimated time of arrival, GPS tracking, routing and planning tools, tracking tools for student embarkation and debarkation, field trip scheduling and invoicing.	August 2015
8-K.1	Assign monitors to buses per Individualized Education Program requirements upon release from the Lopez decree.	<b>Accept</b> Release from the Lopez decree will allow for more flexibility and better utilization of existing bus monitors throughout the entire fleet. Metro Legal is currently (October 2014) working to request a release from this legal decree from 2009.	Dependent upon release from Lopez Decree
8-L.1	Analyze routes to include actual bus counts submitted by drivers.	<b>Accept</b> Transportation currently conducts this analysis twice yearly. Beginning with the 2015-16 school year, the transportation department will be conducting counts on a monthly basis.	July 2015
8-M.1	Explore methods of recording all miles that make for easy retrieval of the data for reporting purposes.	<b>Accept</b> Recording all miles traveled is a function of the new transportation management system software. Note that this GPS-based tracking system is also installed on the entire MNPS white fleet, which will also allow for monitoring of all white fleet vehicles.	August 2015
Chapter 8- Alternative Sourcing Recommendation (page 8-47).			

## Management Response

TRANSPORTATION

	Recommendation	Concurrence and Corrective Action Plan	Proposed Completion Date
	<p>Given the potential average annual estimated cost savings of \$4,097,300 per year, the School System should move forward with a formal request for proposal process during the 2014-15 school year to determine if the savings opportunities can in fact be realized.</p>	<p><b>Reject</b></p> <p>The assessment by First Student Inc. provided to the auditors was performed four years ago when the Transportation Department's business model was different and under different management. The figures quoted are not indicative of the current operating model, nor can they be validated with the current audit data provided. In addition, bid estimates created from data in this audit report and offered by private providers does not include 'in kind services' (buses provided from the transportation budget for special events).</p> <p>Any RFP for outsourcing transportation services should make an equal comparison to the current management of field trips and other 'in kind' services provided by the MNPS transportation department. This means that any RFP for outsourcing transportation services should include the provision that all field trips and all 'in kind' transportation (buses provided for special events at no cost to the school) be included in the bid cost of operation as currently exists in the MNPS transportation budget.</p>	<p>N/A</p>

## Management Response

TECHNOLOGY MANAGEMENT

	Recommendation	Concurrence and Corrective Action Plan	Proposed Completion Date
Management of Metropolitan Nashville Public Schools should:			
10-A.1	Adopt a staffing methodology to assess and determine the appropriate staffing level for the technical support specialists required to provide adequate support to the schools.	<b>Partially Accept</b> MNPS agrees with this recommendation and notes the district already has such a methodology. The Learning Technology Plan outlines the needs for staffing based on industry standards. The support: devices ratio that is recommended is not a realistic goal for the district.	Already in place
10-A.2	Develop a staffing plan to address any staffing shortfalls as a result of the assessments using the adopted staffing methodology.	<b>Partially Accept</b> See above. A more workable solution is to invest in technologies that will provide customer support.	Already in place
10-A.3	Develop key performance indicators with targets to measure the effectiveness of the technology support provided to the schools.	<b>Reject</b> The district already uses the Council of the Great City Schools' suggested Key Performance Indicators (KPIs).	N/A
10-B.1	Research, assess, and develop a comprehensive five-year long-range technology plan.	<b>Accept</b> The plan was developed during the 2012-2013 school year and is in implementation.	Already in place
10-B.2	Develop a detailed hardware migration and replacement strategy that would integrate with the five-year long-range technology plan.	<b>Partially Accept</b> MNPS agrees with this recommendation and notes that hardware migration and replacement is funded by the capital budget. Allocation of funds is based on Mayor and Council Approval. Funding is available for some years, but not in others. This makes it difficult to plan long-term. Current strategy is to use hardware until "end of life" and refresh as needed.	Already in place
10-C.1	Appoint a dedicated technology security officer to ensure that its information security needs are met.	<b>Accept</b> Funding for a security officer position will be included in the 2015-2016 Budget Request	July 2015
10-D.1	Develop plans to redesign and implement new websites for the School System and schools.	<b>Accept</b> Blackboard Engage has been selected by the Communications Department and Learning Technology Department as the platform for all new district and school websites. Rollout of the new district website occurred in late October 2014 with school websites being	October 2014 through August 2015

## Management Response

	Recommendation	Concurrence and Corrective Action Plan	Proposed Completion Date
		upgraded over the next six months to a year.	
10-D.2	Redesign and implement new websites using SharePoint as the platform.	<b>Reject</b> After a thorough review of SharePoint and other web platforms, Blackboard Engage was selected by the Communications Department and Learning Technology Department as the platform for all new district and school websites. See 10-D.1 response.	N/A
10-E.1	Establish a disaster recovery team.	<b>Partially Accept</b> A disaster recovery plan does exist for the Department of Technology and Information Services. Development and implementation of a district level plan will require a commitment from all departments, as well as a dedicated FTE (possibly the Security FTE mentioned in 10-C.1).	Already in place
10-E.2	Revisit the selection of the planned location to house the backup computing facility.	<b>Accept</b> A cost/benefit analysis will be performed.	Summer 2015
10-F.1	Develop a professional development and training program for the technical staff that would be incorporated into the performance evaluation process.	<b>Accept</b> Plans are being formulated to address the professional support/training needs of all support personnel. The Technology & Information Services (TIS) Department will be included.	July 2015
10-F.2	Establish a training budget to ensure the technical staff has the appropriate knowledge and skills to perform their job responsibilities.	<b>Accept</b> Request for funding will be included in next budget year.	July 2015
10-G.1	Form a task force of key stakeholders from the School System and Metropolitan Government to address and resolve issues with the Oracle Enterprise Business Solutions (EBS) that impacts the school district's requirements.	<b>Partially Accept</b> The district will investigate the feasibility of this recommendation, which would require involvement of the district's Technology Information Services, Business Office, Purchasing, and Human Capital departments, as they are the primary users of EBS, as well as Metro Government ITS.	July 2015
10-G.2	Develop a service-level agreement (SLA) between the School System's Technology and Information Services Department and Metropolitan Information Technology Department based on input from the task force to ensure that the support and services	<b>Partially Accept</b> The Technology Information Services Department can assist with developing SLAs for the departments referenced in 10-G.1	TBD

## Management Response

TECHNOLOGY MANAGEMENT

	Recommendation	Concurrence and Corrective Action Plan	Proposed Completion Date
	provided meet expectations.		
10-G.3	Represent the School System's Technology and Information Services Department at all governance meetings held by Metropolitan Information Services Department.	<b>Accept</b> Metro Schools is now included in Metro ITS meetings where pertinent issues with potential impact to MNPS will be discussed.	January 2015
10-H.1	Develop policies and procedures to govern and guide technology support activities.	<b>Accept</b> MNPS agrees with this recommendation and notes the district has numerous policies and procedures in place to govern and guide the use of technology. They are reviewed annually to ensure they are kept current.	Already in place

## Management Response

	Recommendation	Concurrence and Corrective Action Plan	Proposed Completion Date
Management of Metropolitan Nashville Public Schools should:			
12-A.1	Design and implement a formal process for the evaluation of the School System’s educational programs and initiatives.	<p><b>Partially Accept</b></p> <p>MNPS currently evaluates many of its educational programs and initiatives. The Research, Assessment and Evaluation Department conducts much of the analysis included in program evaluations, and often works with outside agencies conducting evaluations to provide necessary data or assist in analysis and interpretation. MNPS notes that some grants require an independent evaluation.</p> <p>The audit lists three programs that have been evaluated since 2009-10, when in fact there have been many more. MNPS uses its Academic Performance Framework to evaluate many of its educational programs and initiatives. Some additional program and/or initiative evaluations include: Music Makes Us, Pre-Kindergarten, Career and Technical Education (CTE), MNPS Achieves, individual School Improvement Plan analysis/reviews, The Academies of Nashville, Reading Recovery, Social and Emotional Learning, Diversity Management, Community Achieves, Limitless Libraries and many others that vary in levels of complexity/detail.</p> <p>The district will review current evaluative protocols being used across the system for consideration of potential internal best practices that can be applied to a more strategic and comprehensive process. (e.g. School Improvement Plan evaluations, state and federally funded program and initiative evaluations, data warehouse reports relating to specific program participation).</p> <p>A protocol will be piloted and improvements made prior to taking it to scale. Evaluations will consist of predefined levels of complexity in the model design.</p>	December 2016
12-B.1	Develop a formal performance accountability system to better manage and oversee administrative and operational functions on a monthly basis.	<p><b>Accept</b></p> <p>As stated within the MJLM audit, many MNPS departments utilize the Council of the Great City Schools’ (CGCS) Key Performance Indicators (KPI) as a mechanism for not only benchmarking performance, but also as a way to monitor performance on a monthly basis. Departments also have performance measures drafted within their strategic action plans which are aligned to the MNPS strategic plan, <b>Education 2018</b>.</p> <p>The focus going forward will be to expand the district’s use of the CGCS KPI software tool in all divisions to inform progress being made on operational efficiencies and performance. In addition, each</p>	June 2016

## Management Response

	Recommendation	Concurrence and Corrective Action Plan	Proposed Completion Date
		<p>division's strategic action plan will be revisited to ensure a more concise/focused overview is being monitored with related performance indicators. The more detailed action plans already drafted will be used at the department level to provide greater background on areas of focus as needed.</p>	